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Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,)	
)	Case No. 3:05-0076-06-RRB-JDR
Plaintiff,)	
)	
v.)	<u>DECLARATION OF COUNSEL</u>
)	<u>IN SUPPORT OF THE</u>
)	<u>UNITED STATES' MOTION TO</u>
TANYA E. CHAISON,)	<u>FILE LATE MOTION RESPONSES</u>
)	
)	
)	
Defendant.)	Filed on Shortened Time
_____)	

I, Frank Russo, counsel for the United States of America, declare as
follows:

1. On February 10, 2006, in the late afternoon, defendant Chaison filed approximately 13 pre-trial motions. Many of these motions were joined by her co-defendants Roderick Williams and Byron Williams.

2. In its order for progression of the case, the Court allows the government five business days to respond to said motions. Thus, the motion responses are due on February 17, 2006.

3. I have completed drafts of roughly half of the motions filed. However, on Wednesday, February 15, I have a hearing in the morning in United States v. Turner, Case No. 3:05-cr-102 - (RRB), for which I need to prepare for and meet with victims. In the afternoon, I am scheduled to meet with law enforcement officers from another country for most of the afternoon. These officers are flying into Anchorage specifically for this meeting.

4. I then plan on being out of state on business on Thursday and Friday of this week. When I am not traveling, I am scheduled to meet with witnesses. I plan returning on Friday evening.

5. Given the above, together with number of defense motions filed, I respectfully request an extension of one business day to file the Government's responses. This would allow for the Government to respond on February 21, 2006.

6. Trial in this case is currently scheduled for April 10, 2006, although there is an unopposed motion to continue pending.

RESPECTFULLY SUBMITTED this 17th day of February, 2006 in Anchorage, Alaska.

DEBORAH M. SMITH
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s/ Frank V. Russo
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I declare under penalty of perjury that a true and correct copy of the foregoing was sent to the following counsel of record on Feb. 14, 2006, via:

(X) Electronic case filing notice

David Weber, Esq.

s/ Frank V. Russo